
From: Brennan Morrissett
Sent: Monday, January 14, 2019 9:22 AM
To: Brennan Morrissett
Subject: FW: Kimberly Beach v. Costco Wholesale Corporation

From: Benjamin Boscolo <BBoscolo@chasenboscolo.com>
Date: January 10, 2019 at 7:57:17 PM EST
To: Matthew Haynes <mhaynes@lawmh.com>
Cc: Ashley Strandjord <AStrandjord@chasenboscolo.com>
Subject: Re: Kimberly Beach v. Costco Wholesale Corporation

Matt

Will get you deposition notices tomorrow

I do not know what you mean about the type of questions I will ask in the deposition. I plan on asking questions designed to lock in facts that are relevant to the elements of Ms. Beach's claims against Costco

Thanks.

Benj

Please excuse any typographical errors. This message was sent from my PDA with voice recognition software

On Jan 10, 2019, at 3:44 PM, Matthew Haynes <mhaynes@lawmh.com> wrote:

Ben:

I am still waiting on the deposition notices for the corporate representative and Mr. Barney. I expect we may have objections to some of the proposed topics. Also, please confirm you will not employ "Reptile Theory" tactics at any time during either deposition. Otherwise, I will need to file a Motion for Protective Order.
Matthew

<image001.jpg>

J. Matthew Haynes, Jr.
1111 E. Main St. Suite 2100 | Richmond, Virginia 23219
Mail to: P.O. Box 796 | Richmond, Virginia 23218
Ph: (804)-775-3809 | **F:** (804) -775-3800
www.lawmh.com | mhaynes@lawmh.com

